# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,		)	EAST ST. LOUIS OFFICE
	Plaintiff,	)	
vs.		)	CRIMINAL NO. <u>22-30003-N</u> UR
ISAIAH HAYNES,		)	Title 18
	Defendant.	)	United States Code, Section 2252A(a)(2) and (b)

## INDICTMENT

#### THE GRAND JURY CHARGES:

### COUNT 1

#### DISTRIBUTION OF CHILD PORNOGRAPHY

From on or between February 27, 2021 and March 1, 2021, in Saint Clair County, within the Southern District of Illinois,

# ISAIAH HAYNES,

defendant herein, knowingly distributed any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), including the following five video files containing the following file names: ef164d34-8ac8-451b-b0f4-c6315a17fcdc.0, 2285092b-215f-4c1e-a973-6dab4d2871c5.0, 0adb6967-7493-45b9-b065-b9c4172c5bc1.0, 39b8b2d9-6827-4f75-b896-2b0b87ed93fa.0, and 0296750a-fbe1-4b7f-ab84-d1d8cbf07ec6.0, that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2) and (b).

#### FORFEITURE ALLEGATION

Upon conviction for the offense charged in this Indictment, defendant Isaiah Haynes, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all material that contained any images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), and any and all property used and intended to be used in any manner

or part to commit and to promote the commission of the charged offenses.

The property that is subject to forfeiture referred in the paragraph above includes, but is not limited to, the following:

Plus 7T cellular phone with IMEI 990013830245812

HP computer, black in color, seized from Isaiah Haynes

Alukan

ALEXANDRIA BURNS
Assistant United States Attorney

Digitally signed by STEVEN WEINHOEFT Date: 2022.01.14 12:07:40

STEVEN D. WEINHOEFT United States Attorney